

Message

From: Atkinson, Emily [Atkinson.Emily@epa.gov]
Sent: 1/8/2018 5:01:19 PM
To: Hengst, Benjamin [Hengst.Benjamin@epa.gov]
CC: Lewis, Josh [Lewis.Josh@epa.gov]
Subject: RE: Meeting Request re: Natural Gas Vehicles
Attachments: Updated VNG Comments on EPA-HQ-OAR-2015-0827.pdf; NGV Executive Action Summary.docx

Ok sounds good – thanks Ben.

From: Hengst, Benjamin
Sent: Monday, January 08, 2018 11:59 AM
To: Atkinson, Emily <Atkinson.Emily@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Meeting Request re: Natural Gas Vehicles

I think 45 min would be appropriate.

OTAQ invitees would be:

Chris G
 Bill Charmley
 Ben Hengst
 Robin Moran
 Jeff Alson
 Julia Burch
 David Orlin
 Mark Kataoka

In talking to Bill, you guys can convey that we don't think that this is a big priority, but that they seem to be heavily engaged with OP political management already, so it makes sense to make sure OAR political management is up to speed, too.

Thanks-Ben

From: Atkinson, Emily
Sent: Monday, January 08, 2018 11:25 AM
To: Hengst, Benjamin <Hengst.Benjamin@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Meeting Request re: Natural Gas Vehicles

Thanks Ben – we can run this recommendation by Bill and then I can reach out to set this one up. If Bill wants to take this meeting – who from OTAQ would you like included on the scheduler? And would 30 minutes be enough or is 45 minutes more appropriate for this group?

From: Hengst, Benjamin
Sent: Monday, January 08, 2018 10:57 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Cc: Atkinson, Emily <Atkinson.Emily@epa.gov>
Subject: RE: Meeting Request re: Natural Gas Vehicles

Josh—I ran the traps on this. OTAQ’s recommendation is that Bill Wehrum should take the meeting, but that it should be on a later timeline (e.g., early to mid-February).

Please let me know if you want to discuss more. Thanks--Ben

From: Lewis, Josh
Sent: Friday, January 05, 2018 1:16 PM
To: Hengst, Benjamin <Hengst.Benjamin@epa.gov>
Cc: Atkinson, Emily <Atkinson.Emily@epa.gov>
Subject: FW: Meeting Request re: Natural Gas Vehicles

Drew Feely in OP called me about something yesterday and mentioned the meeting below in passing...if I’m recalling correctly he said you were part of the OTAQ mtg that Jamie references. If that’s true, wondering if you think a follow up meeting now w/ Bill is appropriate?

From: Tucker, Jamie [mailto:jtucker@AKINGUMP.COM]
Sent: Wednesday, January 03, 2018 3:21 PM
To: Atkinson, Emily <Atkinson.Emily@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Cc: Feeley, Drew (Robert) <Feeley.Drew@epa.gov>
Subject: Meeting Request re: Natural Gas Vehicles

Emily/Josh - On behalf of VNG.Co, a natural gas vehicle fueling infrastructure company, we wanted to see if Assistant Administrator Wehrum would be available this month to discuss a number of administrative and legislative policy changes the company is advocating to promote the adoption of natural gas vehicles largely by leveling the playing field with electric vehicles. We have had recent conversations with the Office of Policy as well as the Office of Transportation and Air Quality to discuss these proposals as well as with staff at the White House and Department of Transportation. With Mr. Wehrum’s confirmation we would like to fold him into the conversation as well.

Natural gas vehicles provide a cost effective and additional pathway for automaker emissions compliance while preserving the products’ consumer appeal, and are therefore worthy of being included in a portfolio of solutions along with EVs to achieve the objectives.

Among the key advantages of the proposed regulatory changes is the benefit to achieving emissions reductions in the light-duty truck category which accounts for 64% of new vehicle purchases (and are responsible for even greater amounts of fuel use and pollution if you take into account the differential in fuel economy between light-duty trucks and passenger cars), and for which there is not a viable electrification solution.

Specifically, we would encourage the Administration to consider:

- **Restoring the 0.15 “divisor”** in EPA’s compliance calculations, equivalent to NHTSA’s statutory Petroleum Equivalency Factor that counts a gallon-equivalent of natural gas as 0.15 gallons of gasoline. The previous Administration ended this powerful incentive while simultaneously providing electric vehicles with additional emissions incentives on the hope that EVs would be “game changers.” The game has now changed for NGVs. The shale revolution that has occurred since the current rules were set as well the development of Renewable Natural Gas as the lowest carbon vehicle fuel are true game changers that strongly justify returning to the 0.15 divisor.

The powerful and well-justified incentive of the 0.15 divisor would be complemented and made even more effective by additional changes including:

- **Eliminating range requirements on bi-fuel NGVs** that results in an impractical natural gas tank size requirement that is twice the size of the gasoline tank and costly design requirements for NGVs, whereas no such range

requirements exists for hybrid electric vehicles. This is the most important regulatory change as a complement to the 0.15 divisor of the three.

- **Providing NGV pick-ups with the bonus credits** provided to “strong electric hybrid pick-ups” and **eliminating the existing minimum 10% deployment threshold** to qualify for pickup bonus credits.
- **Establishing a new incentive to encourage retrofitting existing gasoline and diesel vehicles to run on natural gas**, something that isn’t feasible for electric drives but which will reduce emissions by the existing fleet of vehicles

Enclosed for your further consideration are our Midterm Evaluation comments as well as information outlining the rationale for the recommended regulatory changes.

Thank you for your consideration.

Jamie

Jamie Tucker

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